

EXHIBIT 38

In re Citigroup Inc. Securities Litigation, No. 07 Civ. 9901 (SHS) (S.D.N.Y.)

Supplemental Declaration Exhibit 38

Cases Listed on Page 5 of Mr. Frank's March 15, 2013 Objection [Dkt. No. 222] Regarding His Proposed Survey of PSLRA Settlements of 80% to 120% of \$590 Million

	Case Name	Settlement Amount	Action Includes Non-Scienter Claims	Multiple Corporate Defendants	Restatement
1	<i>In re Wachovia Preferred Sec. & Bond/Notes Litig.</i> , No. 09 Civ. 6351 (S.D.N.Y.)	\$627 million	✓	✓	
2	<i>In re Countrywide Fin. Corp. Sec. Litig.</i> , No. 07 Civ. 5295 (C.D. Cal.)	\$601.5 million	✓	✓	
3	<i>In re Cardinal Health, Inc. Sec. Litig.</i> , No. 04-cv-00575 (S.D. Ohio)	\$600 million			✓
4	<i>In re IPO Sec. Litig.</i> , No. 21 MC 92 (S.D.N.Y.)	\$586 million	✓	✓	
5	<i>In re HealthSouth Corp. Stockholder Litig.</i> , No. 03 Civ. 1500 (N.D. Ala.)	\$804.5 million (combined)	✓	✓	✓
6	<i>In re Lucent Techs., Inc. Sec. Litig.</i> , No. 00 Civ. 00621 (D.N.J.)	\$608.35 million (combined)	✓		✓
7	<i>In re Lehman Bros. Sec. & ERISA Litig.</i> , No. 09 MD 2017 (S.D.N.Y.)	\$516.218 million	✓	✓	
8	<i>In re Merrill Lynch & Co., Inc. Sec., Deriv. & ERISA Litig.</i> , No. 07 Civ. 9633 (S.D.N.Y.)	\$475 million	✓	✓	
9	<i>In re Dynegy, Inc. Sec. Litig.</i> , No. 02 Civ. 1571 (S.D. Tex.)	\$474.05 million	✓	✓	✓